

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

v.

JACK STEPHEN PURSLEY,

Defendant.

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Cause No. 4:18-cr-575

**DEFENDANT’S MOTION IN *LIMINE* TO EXCLUDE GOVERNMENT EXHIBITS
RELATED TO SES – PANAMA**

Defendant Jack Stephen Pursley (“Pursley”) files this Motion in Limine to exclude Government Exhibits 1-3 and 1-3A, which relate to the incorporation of a company named Southeastern Shipping in Panama (“SES-Panama”). In support of his Motion, Pursley states the following:

The Court should exclude these exhibits and any testimony, arguments or references to SES-Panama. SES-Panama is not the “SES” referenced in the Indictment. The subject SES in the Indictment is Southeastern Shipping in the Isle of Man (“SES-IOM”). Hence, SES-Panama is irrelevant under Federal Rule of Evidence 402; and/or it is inadmissible under Rule 403 because any marginal relevance is substantially outweighed by confusing the issues, misleading the jury, undue delay, and wasting time. Moreover, it is inadmissible under Federal Rule of Evidence 404 because the creation and incorporation SES-Panama is an unindicted bad act or wrong. For that additional reason, SES-Panama evidence and testimony is inadmissible under Rule 403.

For the foregoing reasons, Pursley requests the Court exclude testimony, evidence, and argument relating to SES-Panama, including but not limited to Government Exhibits 1-3 and 1-3A, from evidence and award all other appropriate relief.

Respectfully submitted,

/s/ Victor D. Vital

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CERTIFICATE OF SERVICE

I certify that on August 12, 2019, a copy of this document was served on all counsel of record through filing on the ECF System.

/s/ Victor D. Vital

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